

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

DAPHNE SLATER

Plaintiff,

Case No.: 18-cv-11415

Hon. Matthew L. Leitman

v.

ANN ARBOR PUBLIC SCHOOLS
BOARD OF EDUCATION,

Defendant.

STIPULATED PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c), the parties stipulate to the following protective order, and IT IS ORDERED that the following information is deemed confidential:

a) Personnel records of current or former employees, including documents defined as personnel records by the Bullard Plawecki Employee Right to Know Act, MCL 423.501 *et seq*;

b) Medical and mental health records relating to the Plaintiff or any other party (e.g. emails in which a party discloses medical or mental health information);

c) Financial, tax and other similar confidential and personal information relating to Plaintiff.

This confidential information shall only be used to prosecute or defend this action and shall not be disclosed to (or the content discussed with) anyone other than the following persons:

- a. The named parties in this case, their attorneys, and their support staff (e.g., copying and document management personnel).
- b. Independent experts or consultants engaged by a party's attorneys to assist in the preparation and trial of this case who agree to abide by the terms of this Protective Order by signing Exhibit A and who are approved by the producing party pursuant to paragraph 5 below.
- c. Deposition witnesses whose testimony is being taken with respect to the document or thing, or about the subject matter of the document or thing, who agree to abide by the terms of this Protective Order.
- d. This Court and its staff members.

Any such information, that a party believes in good faith to be confidential pursuant to this order, may be redacted in electronic filings or otherwise filed pursuant to local rule. A judge's courtesy copy need not contain the redaction.

This order does not authorize the filing of any documents under seal. Documents may be sealed only if authorized by statute, rule, or order of the Court. A party seeking to file under seal any paper or other matter in any civil case pursuant to this section shall file and serve a motion or stipulation that sets forth (i) the

authority for sealing; (ii) an identification and description of each item proposed for sealing; (iii) the reason that sealing each item is necessary; (iv) the reason that a means other than sealing is not available or unsatisfactory to preserve the interest advanced by the movant in support of the seal; and, if a party files a motion only, (v) a memorandum of legal authority supporting the seal. See Local Rule 5.3. No party shall file or otherwise tender to the Clerk any item proposed for sealing unless the Court has entered an order allowing filing under seal.

Whenever a motion or stipulation to seal is filed, the party seeking to file under seal shall submit a proposed order which states the particular reason the seal is required. The proposed order shall be submitted via the link located under the “Utilities” section of CM/ECF.

/s/Matthew F. Leitman

MATTHEW F. LEITMAN

UNITED STATES DISTRICT JUDGE

Dated: April 19, 2019

We stipulate to entry of this order:

s/ Nicholas Roumel

Attorney for Plaintiff

101 N. Main St., Suite 555

Ann Arbor, MI 48104

(734) 663-7550

nroumel@nachtlaw.com

April 18, 2019

s/Richard M. Mitchell

Attorney for Defendant

Maddin, Hauser, Roth & Heller, P.C.

28400 Northwestern Hwy, 2nd Floor

Southfield, MI 48034

(248) 827-1875

rmitchell@maddinhauser.com

April 18, 2019 **w/permission NR**